

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT CHATTANOOGA

FILED

JAN 14 2019

Clerk, U. S. District Court
Eastern District of Tennessee
At Chattanooga

TERRY HINES

Name of plaintiff (s)

v.

PILGRIMS PRIDE

Name of defendant (s)

Case No. 1:19-cv-11
(to be assigned by Clerk)

HSM/CHS

COMPLAINT

1. A short and plain statement of the grounds for filing this case in federal court (include federal statutes and/or U.S. Constitutional provisions, if you know them):

Comes now Plaintiff, Pro Se, and files this complaint on grounds that Defendants have acted to deny my rights under Title VII, 1964 Civil Rights Act, 42 U.S.C. 2000 (e) 2000e-2 and the Tennessee Human Rights Act ("THRA")

2. Plaintiff, TERRY HINES resides at

813 INDIAN AVE, ROSSVILLE
street address city

WALKER, GA, 30741, 706-403-7698
county state zip code telephone number

(if more than one plaintiff, provide the same information for each plaintiff below)

3. Defendant, PILGRIMS PRIDE lives at, or its business is located at

1300 Market Street, Chattanooga,
street address city
Hamilton, TN, 37402.
county state zip code

(if more than one defendant, provide the same information for each defendant below)

Defendant may be served at

2908 POSTON AVE

NASHVILLE, TN 37203

4. Short and plain statement of your claim (state as briefly as possible the facts of your case and how each defendant is involved. You may use additional paper if necessary):

Defendants have acted to deny my rights under Title VII, 1964 Civil Rights Act, 42 U.S.C.
2000 (e) 2000e-2 and the Tennessee Human Rights Act ("THRA"), based on race, African
American, by paying me less than similarly situated white employees doing the same job
under similar circumstances

5. A demand for judgment for the relief you seek (list what you want the Court to do):

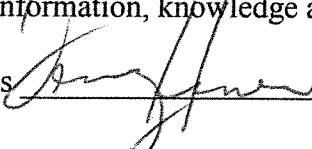
a. a. That Defendants be served and made to appear and answer this

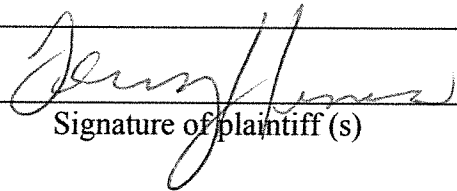
b. b. Jury

c. c. Damages actual and compensatory for lost wages, legal fees an
humiliation in the amount to be determined at trial

d. _____

I (We) hereby certify under penalty of perjury that the above complaint is true to the best of my (our) information, knowledge and belief.

Signed this  day of 14, 20 19


Signature of plaintiff (s)

U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

DISMISSAL AND NOTICE OF RIGHTS

To: **Terry Hines**
813 Indian Avenue
Rossville, GA 30741

From: **Nashville Area Office**
220 Athens Way
Suite 350
Nashville, TN 37228



On behalf of person(s) aggrieved whose identity is
 CONFIDENTIAL (29 CFR §1601.7(a))

EEOC Charge No.

EEOC Representative

Telephone No.

25A-2017-00484

Sylvia D. Hall,
Supervisory Investigator

(615) 736-5855

THE EEOC IS CLOSING ITS FILE ON THIS CHARGE FOR THE FOLLOWING REASON:



The facts alleged in the charge fail to state a claim under any of the statutes enforced by the EEOC.



Your allegations did not involve a disability as defined by the Americans With Disabilities Act.



The Respondent employs less than the required number of employees or is not otherwise covered by the statutes.



Your charge was not timely filed with EEOC; in other words, you waited too long after the date(s) of the alleged discrimination to file your charge



The EEOC issues the following determination: Based upon its investigation, the EEOC is unable to conclude that the information obtained establishes violations of the statutes. This does not certify that the respondent is in compliance with the statutes. No finding is made as to any other issues that might be construed as having been raised by this charge.



The EEOC has adopted the findings of the state or local fair employment practices agency that investigated this charge.



Other (briefly state)

- NOTICE OF SUIT RIGHTS -

(See the additional information attached to this form.)

Title VII, the Americans with Disabilities Act, the Genetic Information Nondiscrimination Act, or the Age Discrimination in Employment Act: This will be the only notice of dismissal and of your right to sue that we will send you. You may file a lawsuit against the respondent(s) under federal law based on this charge in federal or state court. Your lawsuit **must be filed WITHIN 90 DAYS of your receipt of this notice**; or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)

Equal Pay Act (EPA): EPA suits must be filed in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

On behalf of the Commission



Deborah K. Walker,
Area Office Director

OCT 10 2018

Enclosures(s)

(Date Mailed)

cc:

Pilgrims
Attn: Marcos Northway
1770 Promontory Circle
Greeley, CO 80634